

UNITED STATES DISTRICT COURT
for the
EASTERN DISTRICT OF MASSACHUSETTS

DEBRA FELDMAN,
Plaintiff

v.

Civil Action No.: 09-10714

TWENTIETH CENTURY FOX,
TWENTIETH CENTURY FOX TELEVISION,
TWENTIETH CENTURY FOX GROUP,
NEWS CORPORATION, NBC UNIVERSAL, INC.,
UNITED TALENT AGENCY,
WILLIAM MORRIS ENDEAVOR ENTERTAINMENT
TOUCHSTONE TELEVISION PRODUCTIONS
AMERICAN BROADCASTING COMPANIES, INC.
DELUXE PICTURES INC
MARK GORDON, MARC KORMAN,
KEVIN FALLS, SHONDA RHIMES,
GREG BERLANTI, MARC GUGGENHEIM,
THE WALT DISNEY COMPANY
AND DOES 1-75,
Defendants

Supplement
Motion to Reopen – 09-10714-cv
Under Fed.R.Civ.P. Rule 60(a) and Rule 60(b)(2)and (6)

On July 12, 2011, plaintiff Moved to reopen this instant case with new evidence supporting access to her work by the defendants here named. Further developments in this breaking story occur almost daily.

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On July 12, 2011, plaintiff Moved to reopen this instant case with new evidence supporting access to her work by the defendants here named. Further developments in this breaking story occur almost daily.

On July 13, 2011, Peter King, U.S. House of Representatives Republican Chairman of the House Committee on Homeland Security, himself contacted the Director of the FBI, Robert Mueller, regarding News Corporation ("News Corp.") obtaining the phone records of private U.S. citizens through bribery and unauthorized wiretap. (www.guardian.co.uk/world/2011/jul/13/us-senators-phone-hacking-inquiry). [copy of original letter attached.] Both King and fellow N.Y. Representative, Louise Slaughter – top Democrat on the House Rules Committee, demanded an immediate investigation by the Department of Justice.

Four Democratic senators; Jay Rockefeller (Senate Chair of the Commerce, Science and Transportation Committee), Robert Menendez, Barbara Boxer, and Frank Lautenberg (House Appropriations; House Commerce, Science and Transportation; and House Environment and Public Works Committees,) joined in those demands and a full investigation by the D.O.J. (*Id.*)

Senator Lautenberg personally contacted Attorney General Holder to express his fear that current evidence of News Corp.'s wide-ranging hacking campaign may be just the tip of the iceberg [copy of original letter attached]:

"Further investigation may reveal that current reports only scratch the surface of the problem at News Corporation." (*Id.*)

Lautenberg added that "The limited information already reported in this case raises serious questions about the legality of the conduct of News Corporation and

its subsidiaries”, investigation into which could threaten one of the most profitable sectors of the New Corp. organization – the TV networks, which necessarily includes Defendant NBC/Universal. (*Id.*) Additionally, a group of American News Corp. shareholders (including pension funds and banks who have already taken legal action) are among those saying it is "inconceivable" that the News Corp's board was unaware of the phone hacking. (*Id.*)

It would appear that both financial and United States government officials agree with plaintiff; that Defendant News Corp.'s “wrong doing” runs deep and didn't begin yesterday. Keeping plaintiff's instant copyright case from ever coming to trial clearly appears to be part of the greater cover-up going on within the News Corp. organization. Had plaintiff's case already gone to trial, Senator Rockefeller would not now need to call for an investigation into whether the privacy of Americans' has been invaded; (*Id.*) he would already have his answer.

All allegations of both of these causes of action merit further investigation: News Corp.'s criminal activity by the D.O.J. and S.E.C. and News Corp.'s copyright infringement by this Honorable Court. This instant case will do doubt serve as proof of hacking and sadly confirm Senator Lautenberg's great fear ... this is just the tip of the iceberg.

PETER T. KING, NEW YORK
CHAIRMAN

DENNIS H. THOMPSON, MISSISSIPPI
RANKING MEMBER



One Hundred Twelfth Congress
U.S. House of Representatives
Committee on Homeland Security
Washington, DC 20515

July 13, 2011

The Honorable Robert S. Mueller, III
Director
Federal Bureau of Investigation
935 Pennsylvania Avenue, N.W.
Washington, D.C. 20535-0001

Dear Director Mueller:

I am writing to urge that the FBI immediately commence an investigation of News Corporation pertaining to recent media reports alleging that journalists working at the *News of the World*, a News Corp. subsidiary, attempted to obtain phone records of victims of the terrorist attacks of September 11th through bribery and unauthorized wiretapping. I make this request not only as the Chairman of the House Committee on Homeland Security, but as a Member of Congress who represents a district that lost more than 150 constituents in those terrorist attacks. It is my duty to discern every fact behind these allegations.

According the recent reports, journalists working for the *News of the World* solicited a New York police officer to gain access to the content of private phone records of 9/11 victims from the days leading to the attacks. It is revolting to imagine that members of the media would seek to compromise the integrity of a public official for financial gain in the pursuit of yellow journalism. The 9/11 families have suffered egregiously, but unfortunately they remain vulnerable against such unjustifiable parasitic strains. We can spare no effort or expense in continuing our support for them.

If these allegations are proven true, the conduct would merit felony charges for attempting to violate various Federal statutes related to corruption of public officials and prohibitions against wiretapping. Any person found guilty of this purported conduct should receive the harshest sanctions available under law.

I look forward to receiving your response on this request, as well as any updates related to your investigations as they become available. Thank you for your consideration of this urgent matter.

Sincerely,

A handwritten signature in dark ink, appearing to read "Peter T. King", written over a light blue circular stamp.

PETER T. KING
Chairman

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UNITED STATES DEPARTMENT OF JUSTICE
OFFICE OF THE ATTORNEY GENERAL
WASHINGTON, D.C. 20530

July 13, 2011

The Honorable Eric H. Holder, Jr.
Attorney General
U.S. Department of Justice
950 Pennsylvania Avenue, NW
Washington, D.C. 20530

The Honorable Mary L. Schapiro
Chairman
Securities and Exchange Commission
100 F Street, NE
Washington, D.C. 20549

Dear Attorney General Holder and Chairman Schapiro:

I am writing to express my deep concerns regarding allegations that News Corporation and its subsidiaries bribed foreign law enforcement officials for information to advance their business interests. If true, these allegations may be a violation of the Foreign Corrupt Practices Act of 1977 (FCPA), as amended (15 U.S.C. §§ 78dd-1, et seq.). I am asking that the Department of Justice (DOJ) and Securities and Exchange Commission (SEC) examine these issues and consider whether formal investigations are appropriate.

As you know, the anti-bribery provisions of FCPA make it illegal for a U.S. person or company to pay foreign officials to obtain or retain business. In this case, media reports indicate that reporters for *News of the World*, a newspaper that is controlled by a subsidiary of News Corporation, paid London police officers for information, including private telephone information, about the British royal family and other individuals for use in newspaper articles. These allegations originally came to light after it was revealed that the phone of Milly Dowler, a teenager who was kidnapped and murdered in England, had been hacked. Further troubling are the allegations that reporters within the News Corporation organization may have sought information from law enforcement officials in the U.S. about victims of the 9/11 terrorist attack.

As you know, News Corporation is a U.S.-based company subject to FCPA. Indeed, the company's own website states the following: "The Foreign Corrupt Practices Act (FCPA) is a U.S. law that forbids bribery of foreign (meaning non-U.S.) government officials, whether elected or appointed, even if the bribe takes place outside the United States. Because News Corporation is a U.S. corporation, the FCPA may apply to all Company employees everywhere in the world, regardless of their nationality or where they reside or do business."

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The FCPA also includes accounting rules for public companies with securities listed in the United States (15 U.S.C. § 78m). These accounting rules require companies covered by the FCPA to maintain complete and accurate books detailing their transactions and sufficient internal accounting controls within the organization. If indeed bribes were made and not properly recorded, this too may be a violation of law.

The limited information already reported in this case raises serious questions about the legality of the conduct of News Corporation and its subsidiaries under the FCPA. Further investigation may reveal that current reports only scratch the surface of the problem at News Corporation. Accordingly, I am requesting that DOJ and the SEC examine these circumstances and determine whether U.S. laws have been violated.

Thank you for your attention to this matter and I look forward to your timely reply.

Sincerely,

A handwritten signature in black ink, reading "Frank R. Lautenberg". The signature is written in a cursive, flowing style with a large initial "F" and a long, sweeping underline.

July 14, 2011

Respectfully,

/s/ Debra Feldman, pro se

Debra Feldman

A handwritten signature in cursive script, appearing to read "Debra L. Feldman".

CERTIFICATE OF SERVICE

I hereby certify that this document will be sent to the registered participants as identified on the Notice of Electronic Filing (NEF):

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Dated:

July 14, 2011

/s/ Debra Feldman

Debra Feldman